

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>SECURITIES INVESTOR PROTECTION CORPORATION,</p> <p>v.</p> <p>Plaintiff-Applicant,</p> <p>BERNARD L. MADOFF INVESTMENT SECURITIES LLC,</p> <p>v.</p> <p>Defendant.</p>	<p>Adv. Pro. No. 08-01789 (CGM)</p> <p>SIPA Liquidation</p> <p>(Substantively Consolidated)</p>
<p>In re:</p> <p>BERNARD L. MADOFF,</p> <p>v.</p> <p>Debtor.</p> <p>IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff,</p> <p>v.</p> <p>Plaintiff,</p> <p>SIX SIS AG,</p> <p>v.</p> <p>Defendant.</p>	<p>Adv. Pro. No. 12-01195 (CGM)</p>

**STIPULATION AND ORDER
TO EXTEND INITIAL DISCLOSURE DEADLINE**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the estate of Bernard L. Madoff, under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 701–784, and defendant SIX SIS AG (“SIX SIS,” and together with the Trustee, the “Parties”), by and through their respective undersigned counsel, stipulate and agree as follows:

WHEREAS, on July 13, 2023, the United States Bankruptcy Court for the Southern District of New York entered a Case Management Plan in this action, which required that the Parties serve initial disclosures on or before September 11, 2023 (the “Initial Disclosure Deadline”) (ECF No. 155); and

WHEREAS, SIX SIS requested, and the Trustee agreed to, a thirty-day extension of the Initial Disclosure Deadline.

IT IS HEREBY STIPULATED AND AGREED, by the Parties, and **SO ORDERED**, by the Court:

1. The Initial Disclosure Deadline shall be extended to October 11, 2023.
2. The Parties otherwise reserve all rights, arguments, objections, and defenses they may have, and their entry into this stipulation shall not impair or otherwise affect any such rights, arguments, objections, and defenses.

[Signatures appear on the following page.]

Dated: September 6, 2023
New York, New York

/s/ David J. Sheehan

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Attorneys for SIX SIS AG

/s/ Cecelia G. Morris



**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**

**Dated: September 8, 2023
Poughkeepsie, New York**